

ORIGINAL
MISSION RECEIVED

OCT 19 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Mass Media Bureau
Policy and Rules Division
Allocations Branch

Ralph Tyler ("Mr. Tyler"), licensee of KTSH(FM), Tishomingo, Oklahoma, by his attorneys, and pursuant to Section 1.420(i) of the Commission's Rules, hereby respectfully files his Comments on the *Notice of Proposed Rule Making and Orders to Show Cause*, DA 98-1682, released August 28, 1998 ("NPRM").¹

1. The NPRM seeks comment on the following options to amend the Table of Assignments (Section 73.202(b) of the Rules):

No. of Copies rec'd
List ABCDE

¹ Comments are due by October 19, 1998, thus, these Comments are timely filed.

OklahomaChannel No.CityPresentProposedOption I

Alva	259C1, 278C1, 289C2	260C1, 278C1, 289C2
Mooreland	--	283C1
Tishomingo	259C3	--
Tuttle	--	259C3
Woodward	240A, 261C1, 266C, 272A	240A, 266C, 272A, 292C1

Option II

Alva	259C1, 278C1, 289C2	260C1, 278C1, 289C2
Mooreland	--	283C1
Tishomingo	259C3	--
Tuttle	--	259C3
Woodward	240A, 261C1, 266C, 272A	228A, 240A, 266C, 272A

2. Mr. Tyler on March 21, 1997, filed a "Petition for Rule Making and Request for Issuance of Order to Show Cause" in which he requested the Commission to amend Section 73.202(b) of the Rules to (a) delete Channel 259C3 from Tishomingo, Oklahoma, (b) add Channel 259C3 to Tuttle, Oklahoma; (c) modify the license for KTSH(FM), Tishomingo, Oklahoma, to specify "Tuttle, Oklahoma" as the Station's city of license, (d) modify the license of KWFX(FM), Channel 260C1, Woodward, Oklahoma, to operate on Channel 292C1; and (e) modify the license of KXLS(FM), Channel 259C1, Alva, Oklahoma, to operate on Channel 260C1. Mr. Tyler's petition was consolidated with a separate petition for rule making filed by FM 92 Broadcasters, Inc., seeking the substitution of Channel 228A for Channel 261A at Woodward, Oklahoma, and the modification of the license of KWFX(FM), Woodward, Oklahoma, to specify

operation on Channel 228A, and the allotment of Channel 261C1 to Mooreland, Oklahoma, as its first local aural service. Mr. Tyler supports either option, since both would result in the reallocation of channel 259C3 to Tuttle, Oklahoma, and the concurrent modification of the license of KTSH. In support whereof, the following is shown:

3. Two factors must be demonstrated in order to change a station's city of license in a rule making proceeding: (1) the channel changes must be mutually exclusive, and (2) the rule making must not deprive a community of an existing service representing its only local transmission service. The Commission stated that in making the determination of whether to amend the Table of Assignments it would "take into account the totality of the service improvements resulting from a proposed change in community of license in determining whether an allotment proposal should be approved." See Modification of FM and TV Authorizations (New Community of License), 4 FCC Rcd 4870 [66 RR 2d 877] (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990) ("Change of Community MO&O"). Mr. Tyler showed in his petition that his proposal is consistent with the rules and Commission policies, i.e., the proposed allotment is short-spaced to the present KTSH site, and a construction permit (File No. BPH-970220IA) that authorizes a relocation of the KTSH transmitter.

4. The rule making will not deprive Tishomingo of its only local transmission service. Since the time when Mr. Tyler's petition for rule making was filed, a new noncommercial radio station has begun operation at Tishomingo. On or about September 29, 1998, station KAZC(FM), began operating on program test authority on Channel 202 at Tishomingo, Oklahoma. Counsel is informed that on October 5, 1998,

South Central Oklahoma Christian Broadcasting, Inc. ("SCOCB"), filed an application on FCC Form 302-FM seeking a license to cover the construction permit for KAZC.²

5. At NPRM ¶10 the Commission rejected the arguments made in a petition to dismiss filed by Chisolm Trail Broadcasting Co., Inc., that Mr. Tyler's petition conflicts with *Cut and Shoot, Texas*, 11 FCC Rcd 16383 (1996). The Commission stated that while it has stated that the removal of a community's sole local existing service would not be undertaken lightly, it did not place an absolute ban on such actions. The Commission requested Mr. Tyler to provide further information demonstrating why the public interest would be served by removing Tishomingo's sole broadcast service in order to provide a first such service to Tuttle. Intervening matters have now rendered it unnecessary for Mr. Tyler to demonstrate why the public interest would be served by removing Tishomingo's sole local broadcast service in order to provide a first such service to Tishomingo. Tishomingo will not lose its sole local broadcast service. Now that KAZC has begun operation, and an application for license has been filed, it is usually just a matter of time before a license is issued to cover the construction permit. As soon as that happens, the allotment of Channel 259C3 to Tuttle, Oklahoma, will be in full compliance with the Commission's policies set out in *Change of Community MO&O*, *supra*.³ Thus, Mr. Tyler has provided further information demonstrating why the public

² Attached is a copy of SCOCB's letter dated September 29, 1998, to the FCC notifying the FCC of the beginning of operations, and a copy of SCOCB's October 1, 1998, application for license to cover the construction permit. As of October 19, 1998, the application had not yet appeared on public notice.

³ Thus, there is no reason to address the concerns set out in *Llano and Marble Falls, Texas*, 10 FCC Rcd 4913 (1995).

interest would be served by reallocating Channel 259C3 to Tuttle. Mr. Tyler intends to advise the Commission's Policy and Rules Division when the Commission has granted a license for KAZC to SCOCB.

Expression of Continuing Interest

6. If the Commission allots Channel 259C3 to Tuttle, promptly after the effective date of the allotment, Mr. Tyler will file an application for a minor change construction permit to operate KTSH at Tuttle, and upon grant, Mr. Tyler will promptly construct and operate the facilities.

Community Status/Public Interest Considerations

7. As stated in the NPRM, Tuttle had a 1990 population of 2,807 persons. The NPRM acknowledges the evidence submitted with Mr. Tyler's petition for rule making that shows that Tuttle is a community for allotment purposes and possesses the requisite "social, economic and cultural components that are commonly associated with community status." *See, FM Table of Allotments (East Hemet, CA)*, 67 RR 2d 146, 147 (1989). Tuttle has no broadcast stations assigned to it, so KTSH would bring first local service to Tuttle. The NPRM recognized that there is no need for the Commission to determine whether Tuttle is independent of the Oklahoma City Urbanized Area because Tuttle is not located in an Urbanized Area and only 23% of the Urbanized Area will receive a 70 dbu signal from a transmitter operating from the reference point. *See Headland, Alabama, and Chattahoochie, Florida*, 10 FCC Rcd 10342 (1995). Tishomingo had a 1990 population of 3,116 persons with one commercial broadcast station (KTSH) and now has an operating noncommercial FM station (KAZC). A

“Gain/Loss Study” was submitted to show that there would be a net gain of 731,219 in population served from the reference site, and that the “Gain/Loss Study” indicates that there are at least five stations that provide service to the current KTSH service area. Thus, Tishomingo will continued to be well-served by broadcast media.

8. Mr. Tyler also submitted letters supporting the proposal from the Tuttle City Manager, the Mayor, the Chief of Police, the president of the Tuttle Area Chamber of Commerce, and other local residents.

9. As shown in the Technical Exhibit submitted with Mr. Tyler’s petition, Tuttle would be entirely covered by a 70 dBu or better signal from KTSH. Thus, modification of the license for KTSH would be consistent with the Commission's city-grade contour coverage requirements.

Substitution of Channels at Woodward and Alva, Oklahoma

10. Channel 259C3 can be allotted to Tuttle, Oklahoma, at a reference point located at **North latitude 35° 17' 33"**, **West longitude 97° 42' 58"** in compliance with all spacing constraints if Channel 228A or Channel 292C1 is substituted for Channel 261C1 at Woodward, Oklahoma, and the license of KWFX(FM), Woodward, is modified to operate on Channel 228A or 292C1; and if Channel 260C1 is substituted for Channel 259C1 at Alva, Oklahoma, and the license of KXLS(FM), Alva, is modified to operate on Channel 260C1. KWFX can utilize Channel 228A or 292C1 on its present tower, and, likewise, KXLS can utilize Channel 260C1 on its present tower. Mr. Tyler will

reimburse the licensee of KWFY (if applicable)⁴ and the licensee of KXLS for their reasonable and prudent costs incurred in connection with making the channel changes, under the principles of *FM Table of Allotments (Circleville, Ohio)*, 8 FCC 2d 159 (1967). Mr. Tyler requests that the Commission issue an order to the licensee of KWFY, Woodward, modifying its license to operate on either Channel 228A or 292C1, and to the licensee of KXLS, Alva, Oklahoma, modifying its license to operate on Channel 260C1. Issuance of such an order is consistent with Commission precedent where the requesting party has stated its willingness to reimburse the licensee of the stations for reasonable costs associated with the proposed channel changes. See, *FM Table of Allotments (Milton, West Virginia, et al.)*, 10 FCC Rcd 9292 (1995); *FM Table of Allotments (Berlin, Wisconsin)*, 10 FCC Rcd 7733 (1995); and *FM Table of Allotments (Camden, Arkansas)*, 10 FCC Rcd 7208 (1995).

11. The Commission's priorities for assigning FM allotments are set out in *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, 92 [51 RR 2d 807] (1982). They are: (1) first aural service, (2) second aural service, (3) first local service, and (4) other public interest matters. Co-equal weight is given to priorities (2) and (3). Here, first local service to Tuttle is preferred to what would be a second local service to Tishomingo. Thus, there would be a preferential arrangement of allotments resulting from the allotment of Channel 259C3 to Tuttle.

⁴ Mr. Tyler requests the Commission to determine pursuant to NPRM ¶7 whether the licensee of Station KWFY is entitled to reimbursement for the cost of changing its channel.

Conclusion

WHEREFORE, Mr. Tyler respectfully requests the Commission to amend Section 73.202(b) of the Commission's Rules, as follows (changes in **bold**):

Oklahoma

	<u>Present</u>	<u>Proposed</u>
Tishomingo	259C3⁵	202A
Tuttle	----	259C3
Woodward	214C3, 221C3 240A, 261C1 , 266C, 272A	214C3, 221C3 228A or 292A , 240A, 266C, 272A
Alva	259C1 , 278C1 289C2	260C1 , 278C1 289C2


Mr. Tyler requests the Commission to (a) issue an order modifying the license of KWFX, Woodward, Oklahoma, to operate on either Channel 228A or 292C1, and the license of KXLS, Alva, Oklahoma, to operate on Channel 260C1; (b) allot Channel 259C3 to Tuttle, Oklahoma, and (c) modify the license of KTSH to operate on FM Channel 259C3 at Tuttle, Oklahoma. As stated *supra*, if the FCC modifies the license of KTSH to operate on Channel 259C3 at Tuttle, Mr. Tyler will timely file an application for minor change construction permit to operate KTSH at Tuttle, and upon grant thereof, Mr. Tyler will construct the new facilities and operate them; and will reimburse the licensees of

⁵ Tishomingo is receiving service on Channel 202A from KAZC.

KWFX (if applicable) and KXLS for their reasonable costs associated with the channel change.

Respectfully submitted,

RALPH TYLER

By: 

Gary S. Smithwick
His Attorney

SMITHWICK & BELENDIUK, P.C.

1990 M Street, N.W.

Suite 510

Washington, D.C. 20036

(202) 785-2800

October 19, 1997

ATTACHMENT

South Central Oklahoma Christian Broadcasting Inc.

Randall Christy PO Box 1343 ADA, Oklahoma 74820

September 29, 1998

Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: KAZC (FM) CP File BPED970127MD

Dear Ms. Secretary:

This letter is to inform the FCC that KAZC will begin operation under section 73.1620 on September 29, 1998.

A completed FCC form 302 will be submitted within the next 10 days.

Yours Truly,

A handwritten signature in black ink, appearing to read "Randall Christy", with a stylized, cursive script.

Randall Christy
President

cc: KAZC public file

South Central Oklahoma Christian Broadcasting Inc.

Randall Christy PO Box 1343 Ada, Oklahoma 74820

October 1, 1998

Federal Communications Commission
Mass Media Services
P.O. Box 358195
Pittsburgh, PA 15259-5195

Re: Form 302-FM KAZC (FM) BPED970127MD

Dear Ms. Secretary:

Enclosed are the following documents.

One original and two copies of FCC form 302-FM.

One original FCC form 159.

One check in the amount of \$150.00.

Please accept this application for a license to cover a valid construction permit.

If any questions should arise, please contact me at the above address or at (580) 265-4392.

Sincerely,



Randall Christy
President

cc: KAZC public file

PURCHASER'S RECEIPT - RETAIN FOR YOUR RECORDS

FRONTIER STATE BANK

P.O. BOX 95329
OKLAHOMA CITY, OK 73143

105134

REMITTER

Randall Christy

October 1, 1998

39-197/1030

PAYABLE TO

State of Oklahoma Communications Commission

NEGOTIABLE

****150.00****

150.00

MEMORANDUM

CASHIER'S CHECK

NOTICE TO THE PURCHASER: PURCHASE OF AN INDEMNITY BOND WILL BE
REQUIRED BEFORE ANY CASHIER'S CHECK DRAWN ON THIS BANK WILL BE
REPLACED IN THE EVENT OF LOSS OR THEFT.

FOR

Barry Shaw

⑆105134⑆ ⑆103001977⑆ 0100005⑆

FOR
FCC
USE
ONLY

FCC 302-FM

APPLICATION FOR FM BROADCAST STATION LICENSE

(Please read instructions before completing this form.)

FOR MASS MEDIA BUREAU USE ONLY

FILE NO.

Section I - GENERAL

1. APPLICANT NAME

SOUTH CENTRAL OKLAHOMA CHRISTIAN BROADCASTING, INC.

MAILING ADDRESS (Line 1) (Maximum 35 characters)

PO BOX 1343

MAILING ADDRESS (Line 2) (Maximum 35)

CITY

ADA

STATE OR COUNTRY (if foreign address)

OK

ZIP CODE

74820

TELEPHONE NUMBER (include area code)

(405) 265-4392

CALL LETTERS

KAZC

OTHER FCC IDENTIFIER (IF APPLICABLE)

BPED 970127MD

FOR MAILING THIS APPLICATION, SEE INSTRUCTIONS FOR SECTION I

2. A. Is a fee submitted with this application?

☒ Yes ☐ No

B. If No, select the appropriate box to indicate reason for fee exemption (see 47 C.F.R. Section 1.1112) or reason a fee is not applicable and go to Question 3.

☐ Governmental Entity ☐ Noncommercial educational licensee ☐ Other (Please explain):

C. If Yes, provide the following information:

Enter in Column (A) the correct Fee Type Code for the service you are applying for. Fee Type Codes may be found in the "Mass Media Services Fee Filing Guide." Column (B) lists the Fee Multiple applicable for this application. Enter in Column (C) the result obtained from multiplying the value of the Fee Type Code in Column (A) by the number listed in Column (B).

(A)	(B)	(C)									
FEE TYPE CODE	FEE MULTIPLE (if required)	FEE DUE FOR FEE TYPE CODE IN COLUMN (A)	FOR FCC USE ONLY								
(1) <table border="1"><tr><td>M</td><td>H</td><td>R</td></tr></table>	M	H	R	<table border="1"><tr><td>0</td><td>0</td><td>0</td><td>1</td></tr></table>	0	0	0	1	<table border="1"><tr><td>\$ 150.00</td></tr></table>	\$ 150.00	
M	H	R									
0	0	0	1								
\$ 150.00											

To be used only when you are requesting concurrent actions which result in a requirement to list more than one Fee Type Code.

(A)	(B)	(C)									
			FOR FCC USE ONLY								
(2) <table border="1"><tr><td></td><td></td><td></td></tr></table>				<table border="1"><tr><td>0</td><td>0</td><td>0</td><td>1</td></tr></table>	0	0	0	1	<table border="1"><tr><td>\$</td></tr></table>	\$	
0	0	0	1								
\$											

ADD ALL AMOUNTS SHOWN IN COLUMN C, LINES (1) THROUGH (3), AND ENTER THE TOTAL HERE. THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED REMITTANCE.

TOTAL AMOUNT REMITTED WITH THIS APPLICATION	FOR FCC USE ONLY	
<table border="1"><tr><td>\$ 150.00</td></tr></table>	\$ 150.00	
\$ 150.00		

Section I - GENERAL INFORMATION (Page 2)

3. Has an adverse finding been made or an adverse final action been taken by any court or administrative body with respect to the applicant or parties to the application in a civil or criminal proceeding, brought under the provisions of any law relating to the following: any felony; mass media related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.

☐ Yes ☒ No

If the answer is Yes, attach as an Exhibit a full disclosure concerning the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), and the disposition of the litigation. Where the requisite information has been earlier disclosed in connection with another application or as required by 47 U.S.C. Section 1.65(c), the applicant need only provide: (i) an identification of that previous submission by reference to the file number in the case of an application, the call letters of the station regarding the application or Section 1.65 information was filed, and the date of filing; and (ii) the disposition of the previously reported matter.

Exhibit No.

4. For permittees of commercial FM stations only:

Has permittee filed its Ownership Report (FCC Form 323) or ownership certification in accordance with 47 C.F.R. Section 73.3615(b). See Instructions.

☐ Yes ☐ No
☒ Does Not Apply

The APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See 47 U.S.C. Section 304.)

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in the application.

CERTIFICATIONS

5. By checking Yes, the applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. Section 1.2002(b).
6. I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

☒ Yes ☐ No

Name of Applicant RANDALL CHRISTY	Signature <i>Randall Christy</i>
Title PRESIDENT	Date 10-1-98

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of this application is in the public interest. In reaching that determination, or for law enforcement purposes, it may be necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, processing of the application may be delayed or the application may be returned without action pursuant to the Commission's Rules. Your response is required to obtain the requested authority.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. SECTION

SECTION II - TECHNICAL DATA

1. This license application is for a: (check all that apply)

- ☐ Request for program test authority. ☒ Station on automatic program test
- ☐ Commercial station. ☐ Noncommercial station.
- ☐ Directional antenna. ☐ Non-directional antenna.
- ☐ License to cover construction permit for an auxiliary facility.
- ☐ License to utilize former licensed main facility as an auxiliary facility.

SPECIAL OPERATING CONDITIONS MAY PROHIBIT AUTOMATIC PROGRAM TEST AUTHORITY.

2. Call Sign: KAZC 3. Frequency or channel: 88.3 Class: A

4. Community of

City <u>TISHOMINGO</u>	State <u>OK</u>
------------------------	-----------------

5. Select ONE that applies and enter the file number(s) on the appropriate line(s). This application:

(a) ☒ covers a construction permit. Original file BPED 970127 MD

as modified by: _____

as extended by: _____

as replaced by: _____

(b) ☐ modifies a license, file number: _____

6. Is this application being filed pursuant to MM Docket No. 88-375 (Class A Upgrade)?
See Instructions.

☐ Yes ☒ No

If Yes, attach the supplemental Exhibit to this application.

Exhibit No.

IF YOU SELECTED 5(b), "MODIFIES A LICENSE," PROCEED TO ITEM 8.

7. Expiration date of construction permit:

Month <u>4</u>	Day <u>14</u>	Year <u>99</u>
----------------	---------------	----------------

THIS APPLICATION MUST BE ON FILE WITH THE COMMISSION BEFORE THE EXPIRATION DATE OF YOUR CONSTRUCTION PERMIT. SEE INSTRUCTIONS.

SECTION II - TECHNICAL DATA (Page 2)

8. Description of facilities authorized by the construction permit or license noted in Item 5(a) or 5(b):

(a) Antenna 34° 21' 34" N. Lat. 96° 33' 34" W. Lon.

	Horizontal	Vertical
(b) Effective radiated power:	<u>1.75</u> kW	<u>1.75</u> kW
(c) Beam tilt effective radiated power (if applicable):	<u>NA</u> kW	<u>NA</u> kW
(d) Radiation center above ground:	<u>77</u> meters	<u>77</u> meters
(e) Radiation center above mean sea	<u>345</u> meters	<u>345</u> meters
(f) Antenna height above average terrain:	<u>100</u> meters	<u>100</u> meters
(g) Overall tower height above ground (including antenna, all other appurtenances, and lighting, if	<u>445</u> meters	

9. Description of facilities as constructed:

(a) Antenna 34° 21' 34" N. Lat. 96° 33' 34" W. Lon.

	Horizontal	Vertical
(b) Effective radiated power:	<u>1.75</u> kW	<u>1.75</u> kW
(c) Beam tilt effective radiated power (if applicable):	<u>NA</u> kW	<u>NA</u> kW
(d) Radiation center above ground:	<u>77</u> meters	<u>77</u> meters
(e) Radiation center above mean sea	<u>345</u> meters	<u>345</u> meters
(f) Antenna height above average terrain:	<u>100</u> meters	<u>100</u> meters
(g) Overall tower height above ground (including antenna, all other appurtenances, and lighting, if	<u>445</u> meters	

10. Are there any differences between the facilities described in Item 8 and those in Item 9?

☐ Yes ☒ No

IF YES, YOU MAY NOT BE ABLE TO USE THIS FORM. SEE INSTRUCTIONS.

Attach an Exhibit explaining in detail how these differences occurred.

Exhibit No.

11. SPECIAL OPERATING CONDITIONS. Attach an Exhibit that demonstrates compliance with the special operating conditions, terms, and obligations described in the construction permit.

Exhibit No.

☒ Does Not Apply

CONVERSION TO AND FROM METRIC:

METERS = 0.3048 X FEET

FEET = 3.281 X METERS

SECTION II - TECHNICAL DATA (Page 3)

12. Antenna description:

Make	Model Number	Number of Sections	Power Gain
JAMPRO	JMPC -1	1	0.46

If the antenna utilizes beam tilt, null fill, reduced spacing (less than one wavelength) between bays or the antenna is directional or specialized, an exhibit must be attached.

Exhibit No.
NA

13. Transmission line system

(a) Transmission Line(s):

Make	Model Number	Length in Meters	Efficiency
CABLEWAVE	HCC 158-505	105.5 meters	85.7 %
		meters	%

IF MORE SPACE IS NEEDED, PLEASE ATTACH EXHIBIT.

Exhibit No.

(b) Additional losses (Filters, Isocouplers, Multiplexers, etc.) in transmission line system:

Description	Loss in dB	Efficiency
NA	dB	%
	dB	%

IF MORE SPACE IS NEEDED, PLEASE ATTACH EXHIBIT.

Exhibit No.

(c) Total Efficiency of transmission line

85.7 %

14. Transmitter power output (in kilowatts):

4.44 kW

SEE INSTRUCTIONS TO CALCULATE TPO.

15. Operating constants:

(a) D.C. plate current in last radio stage (amperes): 1.125 A

(b) Applied D.C. voltage in last radio stage (volts): 5500 V

(c) Efficiency of transmitter at operating power (percent): 72.0 %

(d) RF transmission line meter reading (percent): 100 %

16. SEE INSTRUCTIONS TO CHECK OPERATING
Is the main studio located within the city of license or the predicted 3.16 mV/m (70 dBu) field strength contour of the main facility?

☒ Yes ☐ No

Exhibit No.

If NO, attach an Exhibit pursuant to the instructions.

17. Location of Main Studio: (P.O. BOXES ARE UNACCEPTABLE)

Street Address or Location Description <u>6.76 KM EAST OF STATE Hwy 99 ON Hwy 7</u>		
City	County <u>JOHNSON</u>	State <u>OK</u>

CONVERSION TO AND FROM METRIC:

METERS = 0.3048 X FEET

FEET = 3.281 X METERS

SECTION II - TECHNICAL DATA (Page 4)

18. Location(s) of Remote Control Point(s):

NA

(a)

Street Address or Location Description

City

County

State

(b)

Street Address or Location Description

City

County

State

If there are additional remote control points, attach an Exhibit which describes their

Exhibit No.

19. Location of Antenna Site:

Street Address or Location Description

6.76 KM EAST OF STATE HWY 99 ON Hwy 7

City

County

State

Johnson

OK

20. CERTIFICATION OF PREPARER

I certify that I represent the applicant in the capacity indicated below and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.

Name (please print or type)	Signature (check appropriate box below)
RANDALL MULLINAX	Randall C Mullinax
Address (include ZIP Code)	Date
5105 S. Shiloh	10-1-98
OKLAHOMA CITY, OK 73129	Telephone No. (include Area Code)
	(405) 616-5500

☐ Technical Director

☐ Registered Professional Engineer

☐ Chief Operator

☒ Technical Consultant

☐ Other (specify)

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PAPERWORK REDUCTION ACT

Public reporting burden for this collection of information is estimated to average 4 hours per response. This estimate includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Records Management Branch, AMD-IM, Paperwork Reduction Project (3060-0506), Washington, D. C. 20554.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1980,
P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

CERTIFICATE OF SERVICE

I, Angela Y. Powell, a paralegal in the law offices of Smithwick & Belendiuk, P.C., certify that on the 19th day of October, 1998, copies of the foregoing Comments of Ralph Tyler were sent via First Class Mail, postage prepaid, to the following:

John A. Karousos, Chief*
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2000 M Street, N.W., Room 565
Washington, D.C. 20554

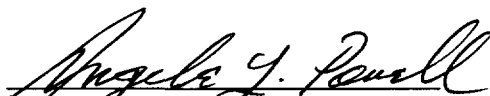
Ms. Leslie K. Shapiro*
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2000 M Street, N.W. Room 565
Washington, D.C. 20554

F. Joseph Brinig, Esq.
1427 Dolly Madison Blvd.
McLean, VA 22101
(Counsel for Classic Communications, Inc. (KWFX-FM))

Andrew S. Kersting, Esq.
Fletcher, Heald & Hildreth, P.L.C.
1300 North 17th Street
11th Floor
Rosslyn, VA 22209
(Counsel for Chisholm Trail Broadcasting Co., Inc. (KXLS))

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